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A PROFESSIONAL LIMITED LIABILITY COMPANY

January 6, 2022

Via ECF

The Honorable Sarah L. Cave
United States Magistrate Judge
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

RE: Edward Woods and Tyrone Hilton v. Fitzcon Construction/Ren Corp., et. al.
20-cv-08088(ALC)(SLC)

Your Honor:

This office represents Plaintiffs in the above-referenced matter. Plaintiffs write to request a brief, two-week extension of time from January 7, 2022 to January 21, 2022 to move for default judgment as to the non-appearing Defendants in this matter. Appearing Defendants consent to this request, which is the first of its kind and will affect no other deadlines. The requested extension is necessary due to the need to finalize Plaintiffs' supporting materials and conflicting obligations of the undersigned.

Plaintiffs thank the Court for its time and attention.

**PHILLIPS & ASSOCIATES,
ATTORNEYS AT LAW, PLLC**

By: /s/ Shawn R. Clark
Shawn R. Clark, Esq.

Plaintiffs' requested extension (ECF No. 52) is GRANTED. By **January 21, 2022**, Plaintiffs shall either (i) voluntarily discontinue their claims against defendants Esco Hirt Co Inc. and Martin Tevlin (together, the "Non-Appearing Defendants"), or (ii) move for default judgment as to the Non-Appearing Defendants in accordance with the individual practices of the Honorable Andrew L. Carter, Jr.

The Clerk of Court is respectfully directed to close ECF No. 52.

SO ORDERED 1/7/2022

A handwritten signature in cursive script that reads "Sarah L. Cave".
SARAH L. CAVE
United States Magistrate Judge